

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	24-08667
)	
DT&T LOGISTICS, INC.)	
)	
)	Chapter 11
)	
)	Judge Deborah L. Thorne
Debtor.)	

**APPLICATION TO SET HEARING ON EMERGENCY MOTION
FOR INTERIM AND FINAL ORDERS: (A) AUTHORIZING DEBTOR TO FACTOR
AND INCUR POST-PETITION SECURED INDEBTEDNESS;
(B) GRANTING SECURITY INTERESTS AND SUPER PRIORITY CLAIMS; (C)
AUTHORIZING USE OF CASH COLLATERAL AND TO SET A FINAL HEARING**

NOW COMES DT&T LOGISTICS, INC. ("DT&T"), by and through their attorney, Saulius Modestas and submits this Application to Set Hearing on Emergency Motion for Interim and Final Orders Authorizing Debtor to Use Cash Collateral and Granting Adequate Protection Pursuant to Sections 361, 362 and 363 of the Bankruptcy Code and to Set a Final Hearing (the "Motion"). In support of the Motion, Debtor states as follows:

1. The Debtor commenced this case by filing a Chapter 11 petition on June 12th, 2024. Debtor has chosen to proceed under Subchapter V of Chapter 11.
2. Debtor is a trucking company and factors its receivables. If it does not fund its accounts from factoring it will run out of money by the morning of July 26th, 2024.
3. RTS has agreed to factor Debtor and an agreement is in place and RTS has local attorneys who are aware of the filing and do not oppose the Motion but they will not fund until there is a signed order authorizing the factoring and use of cash collateral.
4. Debtor seeks to have their Application granted and their attached as Exhibit 1 Emergency Motion heard tomorrow afternoon – July 24th – as the case is already up at that time and so there is enough time for order to be entered and to be provided to RTS so they can fund on July 25th.

WHEREFORE, the Debtor prays for their application set hearing be granted or any other such time as the Court orders and granting such other and further relief as the court deems equitable and just.

/s/ Saulius Modestas
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